

Chapter 5

CONSULTATION AND COORDINATION

5.1 INTRODUCTION

BLM and Western conducted consultation and coordination activities as required by CEQ regulations (40 CFR 1500–1508) regarding NEPA and applicable Federal laws, such as requirements to afford Federal and intergovernmental agencies, States, tribes, stakeholders, organizations, and the public with meaningful opportunities to provide input and identify concerns regarding the EIS.

Section 1.2 of the EIS describes public outreach efforts to date, including scoping at the start of the proposed Project and public involvement during the Draft EIS availability period. Public involvement is a vital component of NEPA for vesting the public in the decision-making process and allowing for full environmental disclosure.

This chapter summarizes specific consultation and coordination efforts carried out by the BLM and Western throughout the development of the EIS. Though not a part of the NEPA process, this chapter also summarizes Southline’s public involvement efforts conducted prior to their filing of the formal ROW application.

5.2 PUBLIC INVOLVEMENT

5.2.1 Southline’s Pre-NEPA Public Coordination

Early in the process, and prior to filling out the ROW application, Southline embarked on a public engagement program that was designed to identify stakeholders and to work closely with these stakeholders. As discussed in chapter 1, Southline conducted a series of over 25 stakeholder meetings and workshops in New Mexico and Arizona throughout July, August, and September 2011 (see table 1-7). The goals of the meetings were to give the public early notification of the proposed Project and to begin work on Project routes with interested stakeholders, such as land management agencies, local jurisdictions, community organizations, and landowners.

Pre-NEPA public meetings were hosted in Deming and Lordsburg, New Mexico (September 21–22, 2011); in Willcox, Tucson, and Marana, Arizona (September 27–29, 2011); and in Benson, Arizona (November 10, 2011). Routing workshops were hosted in Deming (September 22, 2011) and Tucson (September 28, 2011). Southline also met with county commissioners and supervisors from Hidalgo and Luna counties in New Mexico, from Cochise and Pima counties in Arizona, and city administrators from Deming, Columbus, Willcox, and Tucson.

Because of Southline’s early public outreach efforts, the public was informed about the proposed Project and was familiar with the goals of the proposed Project prior to the formal agency public scoping process. Stakeholders had participated in the preliminary routing process, leading to a better public understanding about Southline’s approach to routing. Southline used the input generated from this early public involvement to develop Project routes as proposed in their ROW application, and to identify potentially unsuitable routes. This initial public outreach formed the foundation for the proposed Project’s NEPA public process.

5.2.2 NEPA Public Scoping Period

The public was informed about the formal application for the Project and public scoping period by an NOI published in the Federal Register on April 4, 2012. This initiated the NEPA process for the Project and began a 60-day public scoping period, during which the public had the opportunity to provide input on potential issues to be addressed in the EIS.

As a result of public requests for an extension of the 60-day scoping comment period (ending on June 5, 2012), the scoping comment period was extended by 30 days (ending on July 5, 2012). Notification of the 30-day extension was disseminated via Internet news release and email. NEPA scoping was particularly effective since agencies and the public were already familiar with the proposed Project and had actively been engaged in formulating routing alternatives during Southline's pre-NEPA public outreach.

The comments received became part of the administrative record and are included in the EIS analysis.

Members of the public had several methods for providing comments during the scoping period:

- Comments could be handwritten on comment forms at the scoping meetings. Comment forms were provided to all meeting attendees and were also available throughout the meeting room, where attendees could write and submit comments during the meeting.
- Emailed comments could be sent to a dedicated email address: BLM_NM_Southline@blm.gov.
- Individual letters and comment forms could be mailed via U.S. Postal Service to the BLM Las Cruces District Office.

All comments were given equal consideration, regardless of method of transmittal.

Scoping Meetings

BLM and Western held a total of six public and two agency scoping meetings for the proposed Project: one agency meeting and three public meetings in New Mexico, and one agency and three public meetings in Arizona. As much as possible, public scoping meeting were held in locations intended to provide more immediate and easier access for potential environmental justice communities. The scoping meetings were advertised in a variety of formats, beginning at least 2 weeks prior to their scheduled dates. Table 5-1 identifies the meeting notification methods and dates.

Table 5-1. Scoping Meeting Notification Methods and Dates

Publicity Item	Venue and Date
NOI	Federal Register – April 4, 2012
Newspaper ads	Las Cruces Sun-News – April 20 and May 4, 2012 The Deming Headlight – April 20 and 27, 2012 Hidalgo County Herald – April 19 and May 3, 2012 San Pedro Valley News-Sun – April 19 and May 3, 2012 Arizona Daily Star – April 20 and May 7, 2012 Arizona Range News – April 25 and May 2, 2012 The Eastern Arizona Courier – April 29 and May 9, 2012 The Explorer – May 9, 2012
Email distribution	Email to BLM Stakeholder List – April 27, 2012 – Agency and public scoping notification (653 recipients) June 4, 2012 – Notification of extended comment period (790 recipients) June 28, 2012 – Notification of scoping comment period end date (788 recipients)

Table 5-1. Scoping Meeting Notification Methods and Dates (Continued)

Publicity Item	Venue and Date
Postcard distribution	U.S. Postal Service (Public and agency recipients) – April 23, 2012 – Agency and public postcard notice (626 recipients) April 25, 2012 – Agency and public postcard notice (64 recipients) May 1, 2012 – Notification to permittees (206 recipients)
BLM website	http://www.blm.gov/nm/st/en/prog/more/lands_realty/southline_transmission.html Posting of the meetings at least 15 days prior to the meetings

Table 5-2 gives the dates, times, and locations of the public and agency scoping meetings, as well as the number of attendees.

The meetings were conducted in an open-house format, with a PowerPoint presentation and question-and-answer period following the presentation. The open-house format and presentation were designed to allow attendees to view informational displays and hear a presentation of the proposed Project and summary of the NEPA process, as well as to allow members of the public to ask agency staff about the proposed Project and the EIS process and submit written or verbal comments onsite.

Table 5-2. Public and Agency Scoping Meetings (2012)

Date	Time	City/State	Address	No. of Attendees
Public Meetings				
May 8, 2012	5:30 p.m.	Las Cruces, New Mexico	Mesilla Valley Days Inn and Suites 901 Avenida de Mesilla	22
May 9, 2012	5:30 p.m.	Deming, New Mexico	Mimbres Valley Special Events Center 2300 East Pine Street	30
May 10, 2012	5:30 p.m.	Lordsburg, New Mexico	Dugan-Tarango Middle School 1352 Hardin	20
May 15, 2012	5:30 p.m.	Willcox, Arizona	Quality Inn 1100 West Rex Allen Drive	20
May 16, 2012	5:30 p.m.	Benson, Arizona	Benson Unified High School 360 South Patagonia Street	22
May 17, 2012	5:30 p.m.	Tucson, Arizona	Palo Verde High Magnet School 1302 South Avenida Vega	31
Agency Meetings				
May 8, 2012	10:00 a.m.	Las Cruces, New Mexico	Mesilla Valley Days Inn and Suites 901 Avenida de Mesilla	18
May 17, 2012	10:00 a.m.	Tucson, Arizona	National Advanced Fire and Resource Institute 3265 East Universal Way	31

Meeting attendees were asked to sign in upon entering, at which time they were provided with handouts and informed of the meeting format and how to comment at the meeting. The handouts (i.e., comment form, newsletter, and contact business card) and informational displays provided information about the following:

- NEPA and the EIS process;
- Agency purpose and need;
- Project background;

- Location maps;
- Similarities and differences between the Southline Project and the SunZia project;
- Potentially affected resources and issues to be analyzed in the EIS;
- Planning process and potential amendments to RMP(s); and
- How to provide comments to the BLM and Western.

Additionally, an interactive GIS mapping station was available for meeting attendees to view the proposed Project to aid them in providing comments about specific locations within the analysis area.

These meetings served to provide information on Project planning activities to date, and to give agency personnel and members of the public the opportunity to ask questions or make comments. Presentations were given at each meeting by the BLM National Project Manager and a representative of Southline. Western staff members were also available at the meetings for questions, as were staff members from BLM's Las Cruces, Safford, and Tucson Field Offices, and staff members from Southline. Meeting attendees were encouraged to ask questions and were allowed to provide oral comments after the presentation. However, BLM asked attendees to submit their comments in writing, as no court reporter was present and the meetings were not recorded.

Scoping Comments

Scoping comments were submitted in a variety of formats (i.e., U.S. Postal Service, email, and comment form). All comments and corresponding information (e.g., exhibits, photographs, and maps) were entered into the comment database. Comments were coded to reflect the subject matter of concern, sorted, and summarized for consideration in the development of the EIS. Table 5-3 gives the number of comments received by source.

Table 5-3. Number of Scoping Comments Received by Source

Source	Comments Received
U.S. Postal Service	39
Email	68
Comment Form	26
Total	133

Note: Scoping comments received May 8 through August 1, 2012.

During public and agency scoping, 109 non-duplicative comments were submitted, and 24 comments were received from the same person or organization, for a total of 133 comments received. Comments often addressed multiple issues and included input on several issue categories, which when broken out totaled 576 comments. Table 5-4 shows the comments categorized by issue.

A more detailed description of the scoping process, preliminary issues, and scoping comment analysis is contained in the "Scoping Summary Report" (SWCA 2012). The "Scoping Summary Report" is available at the BLM Project website: http://www.blm.gov/nm/st/en/prog/more/lands_realty/southline_transmission.html.

Table 5-4. Summary of Scoping Comments Received by Issue

Issue Category	Comments Received	Percentage of Total
Air Quality	8	1.4%
Biological Resources	109	18.9%
Cultural Resources	29	5.0%
Hazardous Materials	1	0.2%
Intentional Destructive Acts	1	0.2%
Lands	23	4.0%
Noise	1	0.2%
Military	8	1.4%
Reclamation	1	0.2%
Public Health and Safety	7	1.2%
Recreation	13	2.3%
Request	47	8.2%
Socioeconomics	37	6.4%
Soils and Geology	5	0.9%
Transportation	14	2.4%
Visual Resources	27	4.7%
Water Resources	19	3.3%
Wilderness	4	0.7%
Miscellaneous	23	4.0%
NEPA/Process	199	34.5%
Total	576	

Note: All comments were received by August 1, 2012.

Comments received may have included input on several issue categories.

5.2.3 Draft EIS Comment Period

The public was informed about the availability of the Draft EIS/RMPA via publication of an NOA in the Federal Register on April 11, 2014. This initiated the 90-day comment period, during which the public had the opportunity to provide input on the proposed Project and the analysis in the Draft EIS/RMPA.

The BLM and Western each distributed press releases on April 11, 2014, and paid notices were published in newspapers of record. Both the press release and notices notified the public of the availability of the Draft EIS, the beginning of the 90-day comment period, and public meeting dates, times, and locations hosted by the BLM and Western. As during public scoping (see section 5.2.2), there were several methods for providing comments on the Draft EIS/RMPA during the comment period. These included:

- Comments could be handwritten on comment forms at the public meetings. Comment forms were provided to all meeting attendees and were also available throughout the meeting room, where attendees could write and submit comments during the meeting.
- Emailed comments could be sent to a dedicated email address: BLM_NM_Southline@blm.gov.
- Individual letters and comment forms could be mailed via U.S. Postal Service to the BLM Las Cruces District Office.

All comments were given equal consideration, regardless of method of transmittal.

A total of 87 comment submittals (letters, emails, commenters at hearings) were provided to the BLM and Western during the 90-day Draft EIS comment period; within the 87 letters, there were 797 individual comments. All comments that were received became a part of the administrative record, were entered into an interactive, searchable database and coded to reflect the subject matter of concern, sorted, and summarized. Chapter 8 of this EIS includes all Draft EIS comments and agency responses to these comments in tabular format. Section 1.1.2 in chapter 1 summarizes the changes to the EIS between the Draft and Final documents.

Draft EIS Open House Meetings/Hearings

BLM and Western hosted six public open house/hearings and two agency meetings: one agency meeting and three public open house/hearings in New Mexico, and one agency meeting and three public open house/hearings in Arizona. The meetings and open house/hearings were hosted to provide information on the proposed Project, answer questions about the analysis in the Draft EIS/RMPA, and encourage public comments on the Draft EIS. As much as possible, public open house/hearings were held in locations intended to provide more immediate and easier access for potential environmental justice communities.

The public open house/hearings were advertised in a variety of formats, beginning at least 2 weeks prior to their scheduled dates. Table 5-5 identifies the hearing notification methods and dates. Dates and locations of the public open house/hearings and agency meetings follow in table 5-6.

Table 5-5. Draft EIS/RMPA Open House/Hearing and Meeting Notification Methods and Dates (2014)

Publicity Item	Venue and Date
NOA	Federal Register – April 11, 20124
Newspaper ads	Las Cruces Sun-News – April 18 and May 2, 2014 The Deming Headlight – April 18 and May 2, 2014 Hidalgo County Herald – April 17 and May 1, 2014 El Paso Times – April 25 and May 2, 2014 San Pedro Valley News-Sun – May 7 and May 4, 2014 Arizona Daily Star – May 5 and May 16, 2014 Arizona Range News – May 7 and May 14, 2014 The Eastern Arizona Courier – May 4 and May 14, 2014 The Explorer – May 14, 2014
Legal ads	Las Cruces Sun-News – April 20 and April 27, 2014
Email distribution	Email to BLM Stakeholder List April 14, 2014 – Agency and public scoping notification (998 recipients) May 2, 2014 – Agency and public hearing reminder for New Mexico hearings (998 recipients) May 15, 2014 – Agency and public hearing reminder for Arizona hearings (997 recipients) June 26, 2014 – Reminder comment deadline ends in 2 weeks (1,049 recipients) July 3, 2014 – Reminder comment deadline ends in 1 week (1,061 recipients) July 9, 2014 – Reminder comment deadline ends tomorrow (1,059 recipients)
Postcard distribution	U.S. Postal Service (Public and agency recipients) April 16, 2014 – Agency and public postcard notice (990 recipients) April 16, 2014 – Notification to permittees (268 recipients) April 25, 2014 – Tucson property owners and residents along route (2,056 recipients)
BLM website	http://www.blm.gov/nm/st/en/prog/more/lands_realty/southline_transmission.html Posting of the meetings at least 15 days prior to the meetings

Table 5-6. Locations of Public Open House/Hearings and Agency Meetings for Draft EIS (2014)

Date	Time	City/State	Address	No. of Attendees
Public Open House/Hearings				
May 6, 2014	5:30 p.m.	Las Cruces, New Mexico	Ramada Las Cruces Hotel and Conference Center, 201 East University Avenue	20
May 7, 2014	5:30 p.m.	Deming, New Mexico	Mimbres Valley Special Events Center 2300 East Pine Street	21
May 8, 2012	5:30 p.m.	Lordsburg, New Mexico	Lordsburg Special Events Center 502 West 2nd Street	11
May 20, 2014	5:30 p.m.	Benson, Arizona	Benson Community Center 705 West Union Street	27
May 21, 2014	5:30 p.m.	Willcox, Arizona	Willcox Community Center 312 West Stewart Street	13
May 22, 2014	5:30 p.m.	Tucson, Arizona	El Rio Neighborhood Center 1390 West Speedway Boulevard	31
Agency Meetings				
May 6, 2014	1:00 p.m.	Las Cruces, New Mexico	Ramada Las Cruces Hotel and Conference Center, 201 East University Avenue	20
May 22, 2014	1:00 p.m.	Tucson, Arizona	El Rio Neighborhood Center 1390 West Speedway Boulevard	30

The hearings were conducted in an open-house format, with a PowerPoint presentation and question-and-answer hearing period following the presentation. The open-house format and presentation were designed to allow attendees to view informational displays and hear a presentation of the proposed Project and summary of the NEPA process, as well as to allow members of the public to ask agency staff about the proposed Project and the analysis in the Draft EIS.

An interactive GIS mapping station was available for public open house/hearing attendees to view the proposed Project to aid them in providing comments about specific locations within the analysis area.

A court reporter recorded the BLM and Western presentation, questions and answers, and formal comment portion of each public open house/hearing; transcripts of the public open house/hearings can be found in the project record. Substantive questions and all formal hearing comments are coded and included in chapter 8 of the EIS.

Draft EIS Comments

Comments on the Draft EIS/RMPA were submitted in a variety of formats (i.e., hearing, U.S. Postal Service, email, and comment form). All comments and corresponding information (e.g., exhibits, photographs, and maps) were coded to reflect the subject matter of concern, and sorted for consideration in the development of the Final EIS.

A total of 87 comment submittals (letters, emails, commenters at hearings) was provided to the BLM and Western during the 90-day Draft EIS comment period; within the 87 letters, there were 797 individual comments. Table 5-7 provides a summary of the issues and resource topics commented on during the Draft EIS comment period. All comments that were received became a part of the project record, were coded to reflect the subject matter of concern, were sorted, and were responded to. Chapter 8 of the Final EIS includes all Draft EIS comments and agency responses to these comments in tabular format.

Table 5-7. Summary of Substantive Draft EIS Comments Received by Issue

Issue Category	Comments Received	Percentage of Total
Air Quality	37	4.7%
Biological Resources	73	9.2%
Cultural Resources	36	4.5%
Hazardous Materials	0	0.0%
Intentional Destructive Acts	0	0.0%
Land Use/Military/Farm and Range	114	14.3%
Noise	1	0.1%
Public Health and Safety	6	0.8%
Recreation	1	0.1%
Socioeconomics	27	3.4%
Soils and Geology	2	0.3%
Special Designations	10	1.3%
Transportation	3	0.4%
Trails	11	1.4%
Visual Resources	62	7.8%
Water Resources	22	2.8%
Wilderness	5	0.6%
Miscellaneous	31	3.9%
NEPA/Process	333	41.9%
Requests for information—not substantive	21	2.6%
Total	795	100%

5.2.4 Route Variation Outreach

In December 2014, BLM and Western sent outreach letters to property owners within one half-mile of the route variation alignments east of Willcox Playa in Cochise County and south of Tucson International Airport along Old Vail Connection Road in Pima County. The purpose of the outreach letters was to notify the property owners of the new route variations (see section 2.7) that were added to the EIS analysis. Comments and responses to those outreach letters are included in table 8-1 in chapter 8 and are considered in this EIS.

5.2.5 Project Status

The Project website as well as email was used to provide information regarding Project status to agencies, stakeholders, and other interested parties. There were no direct mailings; however, a copy of the Project newsletter with flyers advertising scoping meetings was sent to libraries, community centers, city and town halls, and senior centers, as well as to the BLM State, District, and Field Offices.

In addition, there is a toll-free information line (800-356-0805) that is provided on written Project material. The information line is maintained and updated by BLM with deadlines, important comment

dates, and publication notification information. Also included are meeting details when meetings are announced, and Project contacts.

5.2.6 Records of Decision

The BLM and Western will each issue separate decisions. The BLM would issue a ROD with all terms and conditions deemed appropriate by the BLM. The BLM decisions to be made are to:

- decide whether to grant, grant with modifications, or deny all or part of the ROW application for the transmission line, substation expansions, and associated access roads and facilities;
- decide whether one or more RMPs would be amended to allow for a ROW for the proposed transmission line and associated facilities;
- decide whether to approve potential RMPA(s) if the proposed Project is not approved;
- determine the most appropriate route across BLM-administered public lands for the transmission line, taking into consideration multiple-use objectives; and
- determine the terms and conditions (stipulations) that should be applied to the construction, operation and maintenance, and decommissioning of the transmission line on BLM-administered public lands.

Once a BLM ROD is issued, it will be distributed to cooperating agencies, tribes, interested organizations, and individuals. An NOA will be published in the Federal Register and advertised in the newspapers listed above in tables 5-1 and 5-5. The ROD will also be made available to everyone who requested a copy of the Final EIS and posted on the Project website.

Western's ROD will announce and explain Western's decision pursuant to Section 1222 of the EPCA of 2005 on whether and under what conditions to participate in the proposed Project and describe any conditions, such as mitigation commitments, that would need to be met. Western may issue a ROD no sooner than 30 days after EPA's Notice of Availability of the Final EIS is published in the Federal Register. If Western decides to allow Southline to upgrade its existing facilities and to use its existing transmission easements as part of the proposed Project, Western and Southline would enter into a joint Project agreement.

5.3 AGENCY CONSULTATION AND COORDINATION

As defined by CEQ regulations, a cooperating agency, or cooperator, is an agency (other than the lead agency) that has special expertise with respect to an environmental issue and/or has jurisdiction by law. Federal, State, and local agencies that have clear jurisdiction over portions of the proposed Project routes were invited via formal letter to become a cooperator in the preparation of the EIS. Tribal governments were also invited to participate in the Project as a cooperating agency and to provide special expertise with respect to environmental issues.

The role of a cooperator is to participate in the process and provide leadership, expertise, guidance, and review, as well as to offer information related to the agency's authority. Cooperators were asked to submit a signed memorandum of agreement that identifies the agreed-upon responsibilities for preparing and participating in the EIS, including activities outlined in 40 CFR 1501.6(b). A cooperator could be a Federal, State, tribal, or local agency with jurisdiction by law or special expertise with respect to an environmental issue. An invitation letter was sent to potential cooperators listed below.

Agencies invited included:

- Arizona Air National Guard
- ADOT
- AGFD
- ASLD
- City of Sierra Vista, AZ
- Cochise County, AZ
- Doña Ana County, NM
- Graham County, AZ
- Grant County, NM
- Greenlee County, AZ
- Hidalgo County, NM
- Luna County, NM
- NMDGF
- NMDOT
- NMSLO
- Pima County, AZ
- Pima County Department of Environmental Quality
- Pinal County, AZ
- U.S. Air Force Davis-Monthan Air Force Base
- USACE
- U.S. Army Fort Huachuca
- U.S. Border Patrol
- BIA
- Reclamation
- DOD
- EPA
- FAA
- FHWA
- FRA
- FWS
- Forest Service
- NPS
- Ak-Chin Indian Community
- Comanche Nation
- Fort Sill Apache Tribe of Oklahoma
- Gila River Indian Community
- Kiowa Tribe of Oklahoma
- Mescalero Apache Tribe
- Navajo Nation
- Pascua Yaqui Tribe
- Pueblo of Acoma
- Pueblo of Isleta
- Pueblo of Laguna
- Pueblo of Tesuque
- Pueblo of Zuni
- Salt River Pima-Maricopa Indian Community
- San Carlos Apache Tribe
- The Hopi Tribe
- Tohono O'odham Nation
- Tonto Apache Tribe
- White Mountain Apache Tribe
- Yavapai-Apache Nation
- Ysleta del Sur Pueblo

Sixteen agencies accepted invitations to participate; the following Federal, State, and local agencies have signed on and have been consulted as cooperating agencies during preparation of the EIS. The mission statement of each agency can be found on their respective websites. These 16 cooperating agencies are:

- USACE (Albuquerque District)
- Reclamation (Phoenix Area Office)
- DOD Clearinghouse
- EPA
- DOD Fort Huachuca
- NPS
- Forest Service (Coronado National Forest)
- FWS (Region 2)
- AGFD
- ASLD

- NMDGF
- NMSLO
- Cochise County, Arizona
- Greenlee County, Arizona
- Graham County, Arizona
- City of Sierra Vista, Arizona

On October 4, 2012 and December 12, 2012, BLM and Western conducted webinars for the cooperating agencies to participate in the alternatives development process for the proposed Project. The agency alternatives developed, as presented in section 2.7 of this EIS, were based in part on input from cooperating agency staff attending these webinars.

On August 24, 2012 and April 13, 2013, BLM and Western conducted Tumamoc Hill outreach meetings in Tucson, Arizona. A follow-up webinar was hosted by BLM and Western on November 7, 2013 to update workshop attendees on proposed Project alternatives and present visual simulations of the proposed Project alternatives around Tumamoc Hill. These meetings and webinars were stakeholder workshops designed to gain input on proposed Project alignments and resource sensitivities around the sensitive Tumamoc Hill area. Attendees at these workshops included agencies and local officials. Coordination with Tucson Ward 1 and their participation in these meetings specifically reached out to neighborhoods surrounding Tumamoc Hill.

Additionally, on June 13, 2013, BLM and Western met with representatives from DOD Fort Huachuca to discuss potential issues with potential alignment alternatives. Representatives from Fort Huachuca expressed concerns regarding impacts from the proposed Project on the BSETR. Meeting notes are included as a part of the administrative record.

The cooperating agencies reviewed the Administrative Draft EIS in October and November 2013, and the Administrative Final EIS in February 2015.

BLM and Western conducted a site visit to the Willcox Playa with the FWS and AGFD in January 2014. The goal of the site visit was to discuss routing options near the playa and to allow FWS and AGFD to discuss their concerns regarding potential impacts near the Willcox Playa. See chapter 2 of the EIS for route variations included as a result of FWS and AGFD outreach.

On December 16, 2014, BLM and Western conducted a webinar for the cooperating agencies to summarize feedback received on the Draft EIS, describe the new route variations, and notify the cooperating agencies that the Agency Preferred Alternative in the Final EIS had changed since the Draft EIS. The cooperating agencies reviewed the Administrative Final EIS in January 2015.

On May 6, 2015, BLM and Western met with representatives from AGFD and FWS to discuss their concerns regarding Project alternatives in the vicinity of the Willcox Playa Wildlife Area. A follow-up meeting was held with Jim DeVos (Assistant Director, Wildlife Management Division) of the AGFD on June 10, 2015. On June 24, 2015, the AGFD provided a letter outlining their mitigation requests to offset impacts to the Willcox Playa Wildlife Area; this mitigation has been incorporated into the PCEMs in chapter 2 (see table 2-8). Meeting notes and the AGFD letter are included as part of the administrative record.

5.4 TRIBAL CONSULTATION AND COORDINATION

In 2012, in compliance with the NEPA, the NHPA (as amended), and EO 13175, the BLM initiated government-to-government consultation with the 21 federally recognized tribes listed below (table 5-8).

- Ak-Chin Indian Community
- Comanche Nation
- Fort Sill Apache Tribe of Oklahoma
- Gila River Indian Community
- The Hopi Tribe
- Kiowa Tribe of Oklahoma
- The Navajo Nation
- Mescalero Apache Tribe
- Pascua Yaqui Tribe
- Pueblo of Acoma
- Pueblo of Isleta
- Pueblo of Laguna
- Pueblo of Tesuque
- Pueblo of Zuni
- Salt River Pima-Maricopa Indian Community
- San Carlos Apache Tribe
- Tohono O'odham Nation
- Tonto Apache Tribe
- White Mountain Apache Tribe
- Yavapai-Apache Nation
- Ysleta del Sur Pueblo

The initial notification letters provided information about the proposed project, initiated government-to-government consultation, invited the tribes to participate as a cooperating agency in the preparation of the EIS, and invited them to participate in NHPA Section 106 process.

This initial outreach and follow-up calls resulted in several face-to-face consultation meetings, which are listed below in table 5-8. Table 5-8 also includes letter and email correspondences with the tribes.

Table 5-8. Correspondence and Meetings with Tribes

Date	Native American Tribe/ Tribal Organization	Description
10/4/2011	San Carlos Apache Tribe	BLM Meeting with San Carlos Apache and White Mountain Apache, which included an overview of the Southline Project. Additional BLM staff present: Connie Stone, Dan McGrew, Amy Sobiech, Joan Galanis, Mike Johnson, Tom Dabbs, and Scott Cooke. Ms. Grant expressed concern about springs and plant resources near Lordsburg and wondered whether there were plans to establish a utility corridor in the area.
10/4/2011	White Mountain Apache Tribe	BLM Meeting with San Carlos Apache and White Mountain Apache, which included an overview of the Southline Project. Additional BLM staff present: Connie Stone, Dan McGrew, Amy Sobiech, Joan Galanis, Mike Johnson, Tom Dabbs, and Scott Cooke.
4/23/2012	Ak-Chin Indian Community	Tribal consultation initiation and cooperating agency invitation letter from BLM.
4/23/2012	Comanche Nation	Tribal consultation initiation and cooperating agency invitation letter from BLM.
4/23/2012	Fort Sill Apache Tribe of Oklahoma	Tribal consultation initiation and cooperating agency invitation letter from BLM.
4/23/2012	Gila River Indian Community	Tribal consultation initiation and cooperating agency invitation letter from BLM.
4/23/2012	Kiowa Tribe of Oklahoma	Tribal consultation initiation and cooperating agency invitation letter from BLM.

Table 5-8. Correspondence and Meetings with Tribes (Continued)

Date	Native American Tribe/ Tribal Organization	Description
4/23/2012	Mescalero Apache Tribe	Tribal consultation initiation and cooperating agency invitation letter from BLM.
4/23/2012	Pascua Yaqui Tribe	Tribal consultation initiation and cooperating agency invitation letter from BLM.
4/23/2012	Pueblo of Acoma	Tribal consultation initiation and cooperating agency invitation letter from BLM.
4/23/2012	Pueblo of Isleta	Tribal consultation initiation and cooperating agency invitation letter from BLM.
4/23/2012	Pueblo of Laguna	Tribal consultation initiation and cooperating agency invitation letter from BLM.
4/23/2012	Pueblo of Tesuque	Tribal consultation initiation and cooperating agency invitation letter from BLM.
4/23/2012	Pueblo of Zuni	Tribal consultation initiation and cooperating agency invitation letter from BLM.
4/23/2012	Salt River Pima-Maricopa Indian Community	Tribal consultation initiation and project introduction letter from BLM.
4/23/2012	San Carlos Apache Tribe	Tribal consultation initiation and project introduction letter from BLM.
4/23/2012	The Hopi Tribe	Tribal consultation initiation and project introduction letter from BLM.
4/23/2012	The Navajo Nation	Tribal consultation initiation and project introduction letter from BLM.
4/23/2012	Tohono O'odham Nation	Tribal consultation initiation and project introduction letter from BLM.
4/23/2012	Tonto Apache	Tribal consultation initiation and project introduction letter from BLM.
4/23/2012	White Mountain Apache Tribe	Tribal consultation initiation and project introduction letter from BLM.
4/23/2012	Yavapai-Apache Nation	Tribal consultation initiation and project introduction letter from BLM.
4/23/2012	Ysleta del Sur Pueblo	Tribal consultation initiation and project introduction letter from BLM.
5/2/2012	The Hopi Tribe	Hopi response letter to BLM, interested in consulting on any proposal that has the potential to adversely affect NRHP-eligible properties.
5/4/2012	White Mountain Apache Tribe	Response letter thanking BLM for the April 23 letter regarding the Southline Project and stating that there is no need to send additional information unless project planning or implementation results in the discovery of sites and/or items having known or suspected Apache Cultural affiliation.
5/7/2012	Ysleta del Sur Pueblo	Ysleta del Sur Pueblo response to BLM consultation initiation letter. The Pueblo currently does not have any comments and believes the project will not adversely affect traditional, religious, or culturally significant sites of Pueblo and does not have any opposition to the Project. Request consultation if any remains or artifacts are found that fall under NAGPRA guidelines.
5/22/2012	Pascua Yaqui Tribe	Email from BLM (Jane Childress) with response to questions from the Pascua Yaqui Tribe.
7/3/2012	Tohono O'odham Nation	Email from BLM with copy of tribal consultation initiation and Project introduction letter.
7/18/2012	Tohono O'odham Nation	Meeting at San Xavier with BLM (Amy Sobiech and Karen Simms also present), Western (Mark Wieringa), San Xavier District Tohono O'odham, Galileo Project (Meredith Griffin). Project Overview and discussion with handouts of Project presentation, maps, and timeline. Tribal concerns with ROW across their lands.
7/20/2012	Four Southern Tribes	Meeting with BLM and 4 Southern Tribes. Sign-In sheet (21 attendees) attached to meeting notes. Southline Project update with PowerPoint presentation and handouts (newsletter and map).

Table 5-8. Correspondence and Meetings with Tribes (Continued)

Date	Native American Tribe/ Tribal Organization	Description
8/28/2012	Pueblo of Zuni	Introductory presentation on the Southline Project, including PowerPoint presentation.
10/15/2012	Ysleta del Sur Pueblo	Introductory presentation on the Southline Project, including PowerPoint presentation and handouts of project area map and PowerPoint presentation.
10/18/2012	San Carlos Apache Tribe	Introductory presentation on the Southline Project, including PowerPoint presentation and handouts of project area map and PowerPoint presentation.
11/9/2012	Pueblo of Isleta	Introductory presentation on the Southline Project, including PowerPoint presentation and handouts of project area map and PowerPoint presentation. Tribe had questions about whether Southline and SunZia would be in the same corridor. That has not yet been determined but is possible in some places.
4/23/2013	Tohono O'odham Nation	Meeting to discuss issues related to Tumamoc Hill. Tribal representatives expressed concerns regarding any routing of the proposed Project that includes Tumamoc Hill.
9/23/2013	The Hopi Tribe	Letter from the Hopi Tribe indicating that they have reviewed the materials sent to them on 9/23/2013 and would like to continue consultation on the project, including reviewing cultural resources survey information and proposed treatment plans.
1/15/2014	The Hopi Tribe	Southline presentation included reviewing maps and discussing cultural issues, including trails, crossing of San Xavier District land, and Tumamoc Hill.
3/27/2014	Ak-Chin Indian Community	Letter from BLM transmitting a CD and hard copy of the Southline Draft EIS. The letter also summarizes the project, lists cooperating agencies, provides email and physical addresses for comments, outlines the length of the comment period, provides locations for public hearings, and extends the offer to arrange consultation meetings and provide additional information.
3/27/2014	Comanche Nation	Letter from BLM transmitting a CD copy of the Southline Draft EIS. The letter also summarizes the project, lists cooperating agencies, provides email and physical addresses for comments, outlines the length of the comment period, provides locations for public hearings, and extends the offer to arrange consultation meetings and provide additional information.
3/27/2014	Fort Sill Apache Tribe of Oklahoma	Letter from BLM transmitting a CD and hard copy of the Southline Draft EIS. The letter also summarizes the project, lists cooperating agencies, provides email and physical addresses for comments, outlines the length of the comment period, provides locations for public hearings, and extends the offer to arrange consultation meetings and provide additional information.
3/27/2014	Gila River Indian Community	Letter from BLM transmitting a CD and hard copy of the Southline Draft EIS. The letter also summarizes the project, lists cooperating agencies, provides email and physical addresses for comments, outlines the length of the comment period, provides locations for public hearings, and extends the offer to arrange consultation meetings and provide additional information.
3/27/2014	Kiowa Tribe of Oklahoma	Letter from BLM transmitting a CD copy of the Southline Draft EIS. The letter also summarizes the project, lists cooperating agencies, provides email and physical addresses for comments, outlines the length of the comment period, provides locations for public hearings, and extends the offer to arrange consultation meetings and provide additional information.

Table 5-8. Correspondence and Meetings with Tribes (Continued)

Date	Native American Tribe/ Tribal Organization	Description
3/27/2014	Mescalero Apache Tribe	Letter from BLM transmitting a CD and hard copy of the Southline Draft EIS. The letter also summarizes the project, lists cooperating agencies, provides email and physical addresses for comments, outlines the length of the comment period, provides locations for public hearings, and extends the offer to arrange consultation meetings and provide additional information.
3/27/2014	Pascua Yaqui Tribe	Letter from BLM transmitting a CD copy of the Southline Draft EIS. The letter also summarizes the project, lists cooperating agencies, provides email and physical addresses for comments, outlines the length of the comment period, provides locations for public hearings, and extends the offer to arrange consultation meetings and provide additional information.
3/27/2014	Pueblo of Acoma	Letter from BLM transmitting a CD copy of the Southline Draft EIS. The letter also summarizes the project, lists cooperating agencies, provides email and physical addresses for comments, outlines the length of the comment period, provides locations for public hearings, and extends the offer to arrange consultation meetings and provide additional information.
3/27/2014	Pueblo of Laguna	Letter from BLM transmitting a CD copy of the Southline Draft EIS. The letter also summarizes the project, lists cooperating agencies, provides email and physical addresses for comments, outlines the length of the comment period, provides locations for public hearings, and extends the offer to arrange consultation meetings and provide additional information.
3/27/2014	Pueblo of Tesuque	Letter from BLM transmitting a CD copy of the Southline Draft EIS. The letter also summarizes the project, lists cooperating agencies, provides email and physical addresses for comments, outlines the length of the comment period, provides locations for public hearings, and extends the offer to arrange consultation meetings and provide additional information.
3/27/2014	Pueblo of Zuni	Letter from BLM transmitting a CD and hard copy of the Southline Draft EIS. The letter also summarizes the project, lists cooperating agencies, provides email and physical addresses for comments, outlines the length of the comment period, provides locations for public hearings, and extends the offer to arrange consultation meetings and provide additional information.
3/27/2014	Salt River Pima-Maricopa Indian Community	Letter from BLM transmitting a CD and hard copy of the Southline Draft EIS. The letter also summarizes the project, lists cooperating agencies, provides email and physical addresses for comments, outlines the length of the comment period, provides locations for public hearings, and extends the offer to arrange consultation meetings and provide additional information.
3/27/2014	San Carlos Apache Tribe	Letter from BLM transmitting a CD copy of the Southline Draft EIS. The letter also summarizes the project, lists cooperating agencies, provides email and physical addresses for comments, outlines the length of the comment period, provides locations for public hearings, and extends the offer to arrange consultation meetings and provide additional information.
3/27/2014	The Hopi Tribe	Letter from BLM transmitting a CD copy of the Southline Draft EIS. The letter also summarizes the project, lists cooperating agencies, provides email and physical addresses for comments, outlines the length of the comment period, provides locations for public hearings, and extends the offer to arrange consultation meetings and provide additional information.

Table 5-8. Correspondence and Meetings with Tribes (Continued)

Date	Native American Tribe/ Tribal Organization	Description
3/27/2014	The Navajo Nation	Letter from BLM transmitting a CD copy of the Southline Draft EIS. The letter also summarizes the project, lists cooperating agencies, provides email and physical addresses for comments, outlines the length of the comment period, provides locations for public hearings, and extends the offer to arrange consultation meetings and provide additional information.
3/27/2014	Tohono O'odham Nation	Letter from BLM transmitting a CD and hard copy of the Southline Draft EIS. The letter also summarizes the project, lists cooperating agencies, provides email and physical addresses for comments, outlines the length of the comment period, provides locations for public hearings, and extends the offer to arrange consultation meetings and provide additional information.
3/27/2014	Tohono O'odham Nation	Letter from BLM transmitting a CD and hard copy of the Southline Draft EIS. The letter also summarizes the project, lists cooperating agencies, provides email and physical addresses for comments, outlines the length of the comment period, provides locations for public hearings, and extends the offer to arrange consultation meetings and provide additional information.
3/27/2014	Tonto Apache	Letter from BLM transmitting a CD copy of the Southline Draft EIS. The letter also summarizes the project, lists cooperating agencies, provides email and physical addresses for comments, outlines the length of the comment period, provides locations for public hearings, and extends the offer to arrange consultation meetings and provide additional information.
3/27/2014	Ysleta del Sur Pueblo	Letter from BLM transmitting a CD and hard copy of the Southline Draft EIS. The letter also summarizes the project, lists cooperating agencies, provides email and physical addresses for comments, outlines the length of the comment period, provides locations for public hearings, and extends the offer to arrange consultation meetings and provide additional information.
4/17/2014	Ak-Chin Indian Community	Invitation letter from BLM to agency only and public Draft EIS meetings.
4/17/2014	Comanche Nation	Invitation letter from BLM to agency only and public Draft EIS meetings.
4/17/2014	Fort Sill Apache Tribe of Oklahoma	Invitation letter from BLM to agency only and public Draft EIS meetings.
4/17/2014	Gila River Indian Community	Invitation letter from BLM to agency only and public Draft EIS meetings.
4/17/2014	Kiowa Tribe of Oklahoma	Invitation letter from BLM to agency only and public Draft EIS meetings.
4/17/2014	Mescalero Apache Tribe	Invitation letter from BLM to agency only and public Draft EIS meetings.
4/17/2014	Pascua Yaqui Tribe	Invitation letter from BLM to agency only and public Draft EIS meetings.
4/17/2014	Pueblo of Acoma	Invitation letter from BLM to agency only and public Draft EIS meetings.
4/17/2014	Pueblo of Laguna	Invitation letter from BLM to agency only and public Draft EIS meetings.
4/17/2014	Pueblo of Tesuque	Invitation letter from BLM to agency only and public Draft EIS meetings.
4/17/2014	Pueblo of Zuni	Invitation letter from BLM to agency only and public Draft EIS meetings.
4/17/2014	Salt River Pima-Maricopa Indian Community	Invitation letter from BLM to agency only and public Draft EIS meetings.

Table 5-8. Correspondence and Meetings with Tribes (Continued)

Date	Native American Tribe/ Tribal Organization	Description
4/17/2014	San Carlos Apache Tribe	Invitation letter from BLM to agency only and public Draft EIS meetings.
4/17/2014	The Hopi Tribe	Invitation letter from BLM to agency only and public Draft EIS meetings.
4/17/2014	The Navajo Nation	Invitation letter from BLM to agency only and public Draft EIS meetings.
4/17/2014	Tohono O'odham Nation	Invitation letter from BLM to agency only and public Draft EIS meetings.
4/17/2014	Tohono O'odham Nation	Invitation letter from BLM to agency only and public Draft EIS meetings.
4/17/2014	Tonto Apache	Invitation letter from BLM to agency only and public Draft EIS meetings.
4/17/2014	Ysleta del Sur Pueblo	Invitation letter from BLM to agency only and public Draft EIS meetings.
5/5/2014	The Hopi Tribe	Letter from the Hopi Cultural Preservation Office concurring that this proposal is likely to adversely affect numerous prehistoric cultural resources significant to the Hopi Tribe but that effects cannot be determined until the alignment is determined. They have reviewed the Draft EIS/RMPA and understand that only 7% of the analysis area has been previously surveyed. They also understand that BLM is attempting to develop a PA to address cultural resource identification for the areas still to be surveyed. They request continuing consultation on the proposal and to be provided with copies of the cultural resources survey and treatment plan for review and comment.
5/13/2014	San Carlos Apache Tribe	Tribal consultation response letter to BLM indicating concurrence with Draft EIS/RMPA report findings.
6/17/2014	Tohono O'odham Nation	Also present: BLM: Mark Mackiewicz, Western: Mark Wieringa, Galileo Project: Ellen Carr, Maria Martin. Meeting at San Xavier with San Xavier District Tohono O'odham to provide Project update and seek comments on the Draft EIS. Meeting included a PowerPoint presentation. Handouts included maps and the May 2014 Project newsletter. Tribal representatives expressed concerns regarding erosion of access roads.
7/25/2014	Fort Sill Apache Tribe of Oklahoma	Letter to BLM requesting detailed information on the footprint of the Southline Project and the Apache and proposed Midpoint substations. A meeting with BLM to review the footprint information is also requested.
7/31/2014	Fort Sill Apache Tribe of Oklahoma	Mr. Thompson called to request a meeting with BLM and also maps of the proposed Southline Project showing the location of the Akela Flats Reservation.
8/4/2014	Fort Sill Apache Tribe of Oklahoma	Email from BLM providing maps for Cochise County and the Akela Flats Reservation.
8/7/2014	Fort Sill Apache Tribe of Oklahoma	Response from BLM to July 25 letter informing Mr. Thompson that no decision has yet been made on the Southline Project and so there are no exact routes yet determined and asking for the locations of Fort Sill Apache trust/fee lands so that BLM can provide a map of the Midpoint and Apache substations in relation to tribal land. The letter also re-invites the Fort Sill Apache Tribe to be a cooperating agency on the Southline Project (original invitation letter from 4/23/12 enclosed) and mentions that Jane Childress will be contacting Chairman Haozous to arrange a meeting.
8/25/2014	Fort Sill Apache Tribe of Oklahoma	Ms. Childress contacted Mr. Haozous to follow up on the request for a meeting.
10/6/2014	Pueblo of Isleta	Meeting to provide update on Southline Project.
2/17/2015	Tohono O'odham Nation	Meeting to provide updates on Southline Project and to present the completed PA.

Government-to-government consultation is conducted in accordance with guidance provided in BLM Manual 8120 (BLM 2004d). Consultation efforts are coordinated by the Project lead for tribal and Section 106. All records of coordination and consultation efforts, including logistical support for meetings and preparation of materials, are part of the administrative record. Although the BLM and Western are responsible for government-to-government consultation with regard to the proposed Project, other cooperating Federal agencies may elect to engage in separate government-to-government consultation with regard to issuance of permits and/or impacts on cultural resources on lands within their jurisdiction.

In recognition of the tribes' special relationship with the U.S. government, the BLM will continue to consult with the appropriate tribal governments at an official executive level (government to government), in accordance with the NHPA, EO 13175, and the NEPA. The BLM has provided opportunities for government officials and members of federally recognized tribes to comment on and participate in the preparation of the EIS and will consider these comments, notify consulted tribes of final decisions, and inform them of how their comments were addressed in those decisions. At a minimum, officials of federally recognized tribal governments will be offered the same level of involvement as state and county officials. Coordination will address consistency with tribal plans, as appropriate; and the observance of specific planning coordination authorities, including Section 101(d)(6) of the NHPA, American Indian Religious Freedom Act, EO 13007 (Indian Sacred Sites), EO 12898 (Environmental Justice), and Secretarial Order 3206 (American Indian Rights, Federal Tribal Trust Responsibilities and the ESA). Although no tribes requested cooperating agency status for the preparation of this EIS, several tribes are participating in Section 106 consultation, which will continue during the post-EIS phases of Project implementation. The tribes that have been actively participating in government-to-government and Section 106 consultations include the Tohono O'odham Nation, the Gila River Indian Community, the Salt River Pima-Maricopa Indian Community, the Ak-Chin Indian Community, the San Carlos Apache Tribe, the Mescalero Apache Tribe, the Fort Sill Apache Tribe, the White Mountain Apache Tribe, the Hopi Tribe, the Pueblo of Isleta, the Pueblo of Ysleta del Sur, and the Pueblo of Zuni.

5.5 FORMAL CONSULTATION

5.5.1 Section 106 of the National Historic Preservation Act

The lead Federal agency, along with any other Federal agency that may be issuing permits or licenses for the Project, has a responsibility under Section 106 of the NHPA to consider the effects of its undertakings on "historic properties" (properties listed in or eligible for the NRHP). Eligible properties may include a diversity of archaeological, historical, and traditional cultural resources. Implementing regulations for Section 106, Protection of Historic Properties (36 CFR 800), define a process for Federal agencies to consult with the SHPOs, ACHP, and other interested parties as they assess the effects of their undertakings and devise methods to resolve those adverse effects.

The Section 106 process is initiated with the establishment of the undertaking (§800.3), which was done shortly after the BLM and Western published the NOI in the Federal Register in April 2012. While the BLM and Western are joint lead Federal agencies for the NEPA process, the BLM is the lead Federal agency for Section 106 compliance. The BLM is also using the NEPA scoping process to satisfy the public involvement process for Section 106 of the NHPA (16 U.S.C. 470f), as provided for in 36 CFR 800.2(d)(3). The Section 106 process was coordinated with the NEPA process, starting with public scoping. During this period, consulting parties were identified and notified of the Project. These parties include the tribes listed above, the Tohono O'odham THPO, SHPOs in Arizona and New Mexico (§800.3(c)), Forest Service (Coronado National Forest), USACE, BIA, Western, ASLD, NMSLO, Arizona State Museum, NPS, Pima County, City of Tucson, Town of Marana, University of Arizona

Desert Laboratory on Tumamoc Hill, National Trust, and Archaeology Southwest. Western is completing tribal consultation related to the Upgrade Section of the proposed Project.

Compliance with other pertinent laws such as the NAGPRA, ARPA, and AIRFA is also being coordinated under the NHPA and NEPA. Federal agencies are required to consult with the public and tribes on the identification of historic properties and the effects that the agencies' undertaking may have on these properties. Western participates as a Consulting Party during these consultations. BLM's consultation with the tribes is conducted on a government-to-government basis, as prescribed by EOs and legislation, including the AIRFA, ARPA, NEPA, and EO 13007.

The Section 106 process entails the identification of historic properties (§800.4) within a defined "area of potential effects" (APE). The APE for this undertaking was determined in consultation and forms the parameters for the identification effort. Identification of historic properties began with a Class I level inventory, which included the review of existing information such as previous inventories and previously recorded sites. In accordance with §800.4 (b)(2), for projects "where alternatives under consideration consist of corridors or large land areas," a phased approach can be followed to identify and evaluate historic properties. Further, "the agency official may also defer final identification and evaluation of historic properties if it is specifically provided for in a . . . programmatic agreement executed pursuant to §800.14(b)." The Final PA is included in appendix L. The PA must be executed before the BLM or Western issues a ROD.

For a project of this scale, an intensive Class III inventory would be conducted on the selected alternative prior to the start of construction. Right-of-entry, as appropriate, would be obtained prior to any fieldwork.

During the Class III inventory, the cultural resources identified would be evaluated for their significance and assessed for their eligibility for the NRHP. Determinations of eligibility would be made in consultation; sites determined eligible or listed in the NRHP are "historic properties." However, since the identification effort would take place in stages for this Project, the identification and evaluation process would be provided for in the PA and deferred until after the ROD and associated approvals.

The assessment of adverse effects on historic properties (§800.5) is typically the next step in the Section 106 process. An adverse effect is found "when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling or association." Due to the scope and complexity of the proposed Project, and because the "effects on historic properties cannot be fully determined prior to the approval of an undertaking" (§800.14(b)(1)(ii)), the BLM determined early in the process that the undertaking would have an "adverse effect" on historic properties. In accordance with §800.6(a)(1), the ACHP was notified of the "adverse effect" determination, concurred with the determination, and agreed to participate in consultations to resolve the adverse effects.

To resolve the potential adverse effects of the undertaking on historic properties, a Project-specific PA was developed among the Section 106 Consulting Parties. The Final PA is provided in appendix L. The PA must be executed before the BLM or Western issues their decisions (RODs).

A list of consultation activities is given below in table 5-9.

Table 5-9. Section 106 Consultation Activities

Date	Agency	Contact Type	Description
4/23/2012	Arizona SHPO	Letter from BLM	Invitation to agency scoping meetings. Map attached.
4/23/2012	New Mexico SHPO	Letter from BLM	Invitation to agency scoping meetings. Map attached.

Table 5-9. Section 106 Consultation Activities (Continued)

Date	Agency	Contact Type	Description
5/14/2012	Arizona SHPO	Letter to BLM	Handwritten comment on copy of 4/23/2012 agency scoping meeting invitation indicating that Arizona SHPO looks forward to Section 106 consultation on the Project. SHPO also asked whether BLM or Western would be taking the lead on the Section 106 consultation.
11/14/2012	Arizona SHPO	Letter from BLM	Project notification letter to Arizona SHPO. Map and Project newsletter attached. Copy to Nancy Brown, ACHP.
11/14/2012	New Mexico SHPO	Letter from BLM	Project notification letter to Arizona SHPO. Map and Project newsletter attached. Copy to Nancy Brown, ACHP.
3/1/2013	ACHP	Letter from BLM	Notification letter to ACHP that the Southline Project would have an adverse effect on historic properties in New Mexico and Arizona and invitation to participate in the Project.
3/19/2013	ACHP	Letter to BLM	Letter advising BLM that ACHP has decided to participate in consultation for the Southline Project.
8/8/2013	Consulting parties	In-person meeting	Kick-off meeting hosted by BLM in Albuquerque, New Mexico. GoTo Meeting conference call was available for those who could not attend.
8/15/2013	Consulting parties	In-person meeting	Kick-off meeting hosted by BLM in Tucson, Arizona. GoTo Meeting conference call was available for those who could not attend.
12/4/2013	Consulting parties	Webinar	Webinar hosted by BLM for resource sensitivity and draft PA review.
4/17/2014	Consulting parties	Letter from BLM	Invitation to agency Draft EIS meetings. Flyer with map attached.
4/17/2014	Consulting parties	Letter from BLM	Invitation to agency Draft EIS meetings. Flyer with map attached.
6/18/2014	Consulting parties	In-person meeting	Meeting hosted by BLM at the San Xavier District Council Chambers to provide an update on Draft EIS, to review and discuss preferred alternatives, tribal concerns, cultural focus areas, and PA. GoTo Meeting conference call was available for those who could not attend.

5.5.2 Section 7 of the Endangered Species Act

Section 7 of the ESA requires Federal agencies to ensure that their actions do not jeopardize the continued existence of threatened or endangered species or result in the destruction of their designated critical habitat. It also requires consultation with the FWS if the action agency determines that an action may affect listed species.

A letter from BLM inviting FWS to participate in the scoping of the proposed Project was sent on April 23, 2012. The FWS provided a written response on June 4, 2012 with comments and recommendations on specific species to evaluate for potential effects as well as suggested mitigation measures. FWS was also consulted on the development of species specific mitigation used in this EIS. FWS comments and recommendations are addressed in Sections 3.8 and 4.8, “Biological Resources.”

Formal consultation under Section 7 of the ESA with the FWS was initiated on March 4, 2014. On April 3, 2014, the FWS responded in a letter indicating that all required information was included in the March 4, 2014 submittal. On July 9, 2014, FWS sent a letter requesting a 60-day extension of the deadline to complete formal consultation. BLM responded on July 30, 2014, concurring with the request for an extension. The FWS issued a BO on December 30, 2014. The BO and amendment are included in

this EIS in appendix M; mitigation and conservation measures have been added to table 2-8 and are considered in the analysis in chapter 4. The Biological Assessment and correspondence with FWS are a part of the Project Record.

5.6 LIST OF PREPARERS AND REVIEWERS

This EIS was reviewed by a team from the BLM and Western. A team associated with SWCA Environmental Consultants assisted the BLM and Western in conducting research, gathering data, and preparing the EIS and supporting documents. Table 5-10 identifies BLM team members and their roles.

Table 5-10. BLM and Western Project Team

Name	Title	Involvement (Section(s) of EIS)	Office
Bill Childress	Las Cruces District Manager	Authorized Officer	Las Cruces District Office
Mark Mackiewicz	Senior National Project Manager	BLM Project Manager	Washington, DC
Mark Wieringa	NEPA Document Manager	Western Project Manager	Western Natural Resources Office
Eddie Arreola	RECO Manager	Military	Arizona State Office
Jane Childress	Cultural and Tribal Lead	BLM Project cultural and tribal Point of Contact	National Transmission Support Team
Mark Massar	Biological Lead	BLM Wildlife and Vegetation	National Transmission Support Team
Scott Whitesides	Planning and Environmental Coordinator	BLM NEPA	National Transmission Support Team
Matt Basham	Archaeologist	Cultural Resources	Arizona State Office, Renewable Energy Coordination Office (RECO)
Steve Blazek	NEPA Compliance Officer	Project initiation	DOE Golden Field Office
Donald Byron	Project Management Team Lead	Engineering Point of Contact	Western Desert Southwest Region
Jeff Conn	Natural Resource Specialist	Wildlife	Safford Field Office
Johnida Dockens	Environmental Protection Specialist	Local Office Point of Contact	Western Desert Southwest Region
Claire Douthit	Attorney/Advisor	Legal	Western Office of General Counsel
Kristen Duarte	Range Management Specialist	Vegetation Farmlands and Rangeland	Tucson Field Office
Vanessa Duncan	Safety & Occupational Health Specialist	Hazardous Materials	Las Cruces District Office
Linda Dunlavey	Realty Specialist	Lands	Tucson Field Office
R.J. Estes	Rangeland Management Specialist	Farmlands and Rangeland/Grazing Vegetation	Safford Field Office
Dennis Godfrey	Public Affairs Officer	Public Affairs	Arizona State Office, RECO
Oswaldo Gomez	Outdoor Recreation Planner	Visual	Las Cruces District Office

Table 5-10. BLM and Western Project Team (Continued)

Name	Title	Involvement (Section(s) of EIS)	Office
Stacey Harris	Public Utilities Specialist	TIP Office Point of Contact	Western Corporate Services Office
Rebecca Heick	Acting Deputy State Director, Lands & Minerals Division; Branch Chief, Minerals and Lands	Minerals	Arizona State Office
Ray Hewitt	Geographer/GIS	GIS Data	Las Cruces District Office
Christopher Horyza	Planning and Environmental Coordinator	Wilderness Characteristics	Arizona State Office
Michael Johnson	Sun Zone Social Scientist	Socioeconomics	Arizona State Office
Craig Knoell	TIP Office Manager	TIP Office Point of Contact (retired)	Western Corporate Services Office
Debby Lucero	Lead Realty Specialist	Land Use	New Mexico State Office
Frank Lupo	Attorney Advisor	Legal	Office of the Solicitor
Dan McGrew	Archaeologist	Cultural Resources (Arizona)	Safford Field Office
Kenneth Mahoney	Program Lead: National Monuments, National Conservation Areas, Wilderness, Wild & Scenic Rivers	Wilderness Characteristics	Arizona State Office
Linda Marianito	Environmental Division Manager	Local Office Point of Contact	Western Desert Southwest Region
Frances Martinez	Realty Specialist	Land Use Special Designations	Las Cruces District Office
Lisa Meiman	Public Affairs Team Lead	Public Affairs	Western Natural Resources Office
Francisco Mendoza	Outdoor Recreation Planner	Recreation Visual	Tucson Field Office
Lisa Meyer	Western Cultural Resources Lead	Western Cultural Point of Contact	Western Corporate Services Office
Jill Jensen	Archaeologist	Cultural Resources	Western Desert Southwest Region
Jennifer Montoya	Planning and Environmental Specialist	BLM NEPA Point of Contact	Las Cruces District Office
Daniel Moore	Geologist	Air Quality Minerals (in Geology) Paleontological Resources	Tucson Field Office
Patrick Moran	Geologist	Minerals (in Geology) Paleontological Resources	Las Cruces District Office
Mohammad Nash	Hydrologist	Air Quality Noise Soils Water Resources (Surface and Ground)	Las Cruces District Office
Jackie Neckels	Environmental Coordinator	Military	Arizona State Office, RECO
Ron Peru	Realty Specialist	Land Use Special Designations Visual	Safford Field Office

Table 5-10. BLM and Western Project Team (Continued)

Name	Title	Involvement (Section(s) of EIS)	Office
Tom Phillips	Acting State Recreation Lead-New Mexico State Office	Wilderness Characteristics	Working from Las Cruces District Office
Todd Rhoades	Project Manager	Engineering Point of Contact	Western Desert Southwest Region
Lynn Richardson	TIP Liaison	TIP Point of Contact	Western Consultant
Dana Robinson	GIS Specialist	GIS Data	Arizona State Office
Karla Rogers	Visual Resources Field Coordinator	Lead Visual Resources	National Operations Center
Jose Sanchez	Natural Resources Specialist	Recreation	Las Cruces District Office
Pam Shields		Project Initiation	Western Desert Southwest Region
Phil Smith	Range Specialist	Farmlands and Rangeland/Grazing Vegetation	Las Cruces District Office
Darrell Tersey	Natural Resource Specialist	Wildlife	Tucson Field Office
Larry Thrasher	Geologist	Minerals (in Geology) Paleontological Resources	Safford Field Office
Steven Torrez	Wildlife Biologist	Wildlife	Las Cruces District Office
Steve Tromly	Native American Liaison	Tribal, Cultural Point of Contact	Western Corporate Services Office
Melissa Warren	RECO Project Manager (former)	Military	Arizona State Office

5.7 THIRD-PARTY CONTRACTOR— SWCA ENVIRONMENTAL CONSULTANTS

5.7.1 Contract Disclosure Statement

SWCA Environmental Consultants (SWCA) is the contractor assisting the BLM and Western in preparing the Draft and Final EIS for the proposed Southline Transmission Line Project. BLM and Western are responsible for reviewing and evaluating the information and determining the appropriateness and adequacy of incorporating any data, analyses, or results in the EIS. BLM and Western determine the scope and content of the EIS and supporting documents and have furnished direction to SWCA, as appropriate, in preparing these documents.

The CEQ's regulations (40 CFR 1506.5(c)), require contractors who prepare an EIS to execute a disclosure statement specifying they have no financial or other interest in the outcome of the project. The term "financial interest or other interest in the outcome of the project" for the purposes of this disclosure is defined in the March 23, 1981, "Forty Most Asked Questions Concerning CEQ's National Environmental Policy Act Regulations," 46 Federal Register 18026–18028 at Questions 17a and 17b. Financial or other interest in the outcome of the project includes "any financial benefit such as promise of future construction or design work on the project, as well as indirect benefits the consultant is aware of (e.g. if the project would aid proposals sponsored by the firm's other clients)" (46 Federal Register 18026–18038 and 10831).

In accordance with these regulations, SWCA hereby certifies that it has no financial or other interest in the outcome of the Project.

Certified by:



Signature

Ken Houser

Name

Principal, Southwest Operations

Title

January 5, 2014

Date

5.7.2 SWCA Team

Table 5-11 identifies SWCA team members and their roles in preparing the EIS.

Table 5-11. SWCA Preparers and Contributors

Name	Involvement (Role or Section(s) of EIS)	Credentials	Years of Experience
Ken Houser	Project Management, NEPA Adequacy	M.A., PG	30
Cara Bellavia		M.U.E.P., B.A.	17
DeAnne Rietz		M.S., CPESC	16
David Brown		M.L.A.	12
Charles Coyle		M.A.	23
Brad Sohm	Air Quality Climate Change Noise	PE	11
Dan Whitley		M.A.	4
Daniel Sloat		B.S., QSTI	10
Matt Bandy	Cultural Resources Paleontological Resources	Ph.D.	23
Adrienne Tremblay		Ph.D.	9
Peter David	Farmlands and Rangeland/Grazing	M.S.	27
Jenny Addy		B.S.	3
Ryan Rausch	Farmlands and Rangeland/Grazing Land Use Special Designations Military	M.E.L.P.	11
Jeffery Johnson		M.S.	9
David Lightfoot	Farmlands and Rangeland/Grazing Vegetation	Ph.D.	28
Vicky Amato		M.S.	10
Jenny Addy		B.S.	3
Steve O'Brien	Geology Minerals (in Geology) Wastes and Hazardous Materials	B.A.	17
Jerome Hess		M.S.	18
DeAnne Rietz	Wastes and Hazardous Materials	M.S., CPESC	16
Jonathan Rigg	Electrical Characteristics (EMF) Transportation Human Health and Safety Intentional Destructive Acts	M.A.	12

Table 5-11. SWCA Preparers and Contributors (Continued)

Name	Involvement (Role or Section(s) of EIS)	Credentials	Years of Experience
Doug Jeavons (BBC Research)	Socioeconomics and Environmental Justice	M.A. (economics) B.A.	25
Cody Stropki	Soils	Ph.D.	13
Eleanor Gladding	Noxious Weeds	M.S.	24
Russell Waldron	Wildlife	B.S.	21
Jeffery Johnson		M.S.	9
Lara Dickson		M.S.	17
Pam Cecere	Visual	M.S.	13
Steve Leslie		B.S.	17
Chris Garrett	Water Resources (Surface and Ground)	B.S., P.HGW.	21
Matt McMillan	Water Resources (Wetlands) Wildlife	M.S.	12
Jean-Luc Cartron	Migratory Birds	Ph.D., M.D.	24
Chris Query	GIS Cartography	M.A.	17
Glenn Dunno		M.A.	19
Allen Stutz		B.S.	19

5.8 FIRST-PARTY CONTRACTOR—CH2M HILL

The Southline Resource Reports referenced in chapters 1–4 of the EIS and in the literature cited in chapter 6 of the EIS, were prepared by a team from CH2M Hill and are available in the Project Record. The Southline Resource Reports are one of many valuable references used in the EIS, and it is important to note that CH2M Hill did not author the EIS. Additionally, considering guidance at 40 CFR 1506.5, the reports were subject to independent evaluation (see section 5.8.1 below). These reports were prepared in 2012 and 2013 and do not include all the data used in the Draft and Final EISs as additional alternatives, route variations, and data were included subsequent to these reports being finalized.

At the request of commenters on the Draft EIS, the CH2M Hill authors of the Southline Resource Reports, their credentials, and years of experience are included here (table 5-12).

Table 5-12. CH2M Hill Southline Resource Report Authors

Southline Resource Report	Author	Credentials	Years of Experience
Report 01: Air Quality and Climate Change	Sheila Rygwelski Robert Pearson	PE Ph.D., PE	12 36
Report 02: Cultural Resources	Fred Huntington Chris Dore Mary Prasciunas	B.A. Ph.D. Ph.D.	24 15 10
Report 03: Farmlands and Rangeland	Molly Cresto	B.S., M.A.	11
Report 04: Geology and Minerals	Greg Warren, PG	B.S., M.A.	19
Report 05: Hazardous Materials and Waste	Christopher Waller	B.S., EIT	5
Report 06: Health and Human Safety	Sheila Rygwelski	PE	12
Report 07: Land Use	Molly Cresto	B.S., M.A.	11
Report 08: Noise	Kevin Belanger Mark Bastasch	M.C.R.P., B.S. PE	4 16

Table 5-12. CH2M Hill Southline Resource Report Authors (Continued)

Southline Resource Report	Author	Credentials	Years of Experience
Report 09: Paleontology	Levi Pratt	B.A.	7
Report 10: Recreation	Cary Olson	B.S., M.S.	15
Report 11: Socioeconomics and Environmental Justice	Fatuma Yusuf	B.S., M.S., Ph.D.	18
Report 12: Soils	Steve Long	B.S., M.S.	25
Report 13: Special Designations	Molly Cresto	B.S., M.A.	11
Report 14: Transportation	Jacqueline Dowds-Bennett	PE, M.S.	21
Report 15: Vegetation	Kim Otero	B.A., M.S.	25
	David Cerasale	Ph.D.	15
	Tom Strong	Ph.D.	25
Report 16: Visual Resources	MariaElena Conserva	Ph.D.	16
	Josh Hohn	M.C.P., M.A.	11
	Mark Greenig	MUP, B.S.	25
	Tom Priestley	Ph.D., M.L.A.	30
	Angela Wolfe	B.S.	8
	Michael Stephan	A.E.	33
Report 17: Water Resources	Matthew Franck	B.S., APA	25
Report 18: Wildlife	Kim Otero	B.S., M.A.	25
Report 19: Military Operations	Cary Olson	B.S., M.S.	15
Report 20: Cumulative	Molly Cresto	B.S., M.S.	11
Project Management and Senior Review	Jen Rouda	B.S., M.S.	17

5.8.1 Independent Review Process

BLM and Western assisted Southline and its consultant CH2M Hill by outlining the types of information required for preparation of the EIS. In the fall of 2012, BLM and Western hosted a series of ID team calls with staff from the BLM, Western, SWCA, and CH2M Hill to provide guidance and data needs for resources to be analyzed in the EIS. BLM and Western, supported by SWCA, provided guidance worksheets to CH2M Hill to outline the types of data needed, as discussed on the fall 2012 ID team calls. The Southline Resource Reports were submitted in early 2013; the SWCA team (see table 5-11) first conducted an initial review of each report and associated data for content and completeness and to identify data gaps. Final review and concurrence was provided by the BLM/Western team (see table 5-10) prior to utilizing portions of the reports and referencing them in the EIS.

5.9 RECIPIENTS OF THE ENVIRONMENTAL IMPACT STATEMENT

BLM and Western will circulate copies of the EIS to any agencies that have jurisdiction and special expertise, those authorized to develop and/or enforce environmental standards, and any agencies or individuals requesting a copy of the document. Copies will also be made available at BLM State, District, and Field Offices, as well as at libraries and on the Project website.

Tribes and cooperating agencies listed in section 5.4 will receive copies of the EIS; cooperating agencies also participated in the finalization of the EIS. Everyone on the most current mailing list will receive notification of the release of the EIS via mailing with a detachable postcard that can be returned to request

a copy of the EIS on CD. Hard copies will be available for public viewing at BLM offices (New Mexico State Office, Las Cruces District Office, Arizona State Office, Safford Field Office, and Tucson Field Office). An electronic copy of the EIS will also be available via BLM's Southline Project website.

A number of organizations and special interest groups have been notified and coordinated with for this Project and have been placed on the Project mailing list. A list of these organizations is provided in table 5-13.

Table 5-13. Organizations and Special Interest Groups Notified

Advisory Council on Historic Preservation
American Wind Energy Association
Anglers United
Animas Foundation
Archaeological Conservancy
Archaeology Southwest
Arizona Association for Environmental Education
Arizona Audubon Society
Arizona Cattle Growers Association
Arizona Dude Ranch Association
Arizona Farm Bureau
Arizona Land and Water Trust
Arizona League of Conservation Voters
Arizona Mining Association
Arizona Association of Conservation Districts
Arizona Off-Highway Vehicle Coalition
Arizona Power Authority
Arizona Public Service
Arizona Riparian Council
Arizona Society of Range Management
Arizona Solar Energy Association
Arizona Trails Association
Arizona Wilderness Coalition
Arizona Wildlife Federation
Audubon New Mexico
Avra Valley Coalition
Back Country Horsemen of America
Cascabel Working Group
Center for Biological Diversity
Center of Excellence for Hazardous Materials Management
Central Arizona Land Trust
Coalition for Sonoran Desert Protection
Coalition of Renewable Energy Landowners Association
Cochise County Farm Bureau
Community Watershed Alliance
Continental Divide Trail Alliance
Defenders of Wildlife
Desert Foothills Land Trust
Desert Laboratory on Tumamoc Hill
Doña Ana County Farm Bureau
Drylands Institute

**Table 5-13. Organizations and Special Interest Groups Notified
(Continued)**

Ecology and Evolutionary Biology Department, University of Arizona
Empire-Fagan Coalition
Environmental Arizona
Freedom to Roam
Friends of Agua Fria National Monument
Friends of Ironwood Forest
Friends of Sonoita Creek
Friends of the Santa Cruz River
Gila Conservation Coalition
Gila Watershed Partnership of Arizona
Graham County Farm Bureau
Grand Canyon Wildlands Council
Grant County Farm Bureau
Greenlee County Farm Bureau
Hidalgo County Farm Bureau
Huachuca Audubon
International Brotherhood of Electrical Workers 611
International Society for the Protection of Mustangs and Burros
Las Cruces 4-Wheel Drive Club
Luna County Farm Bureau
Mountain Bike Association of Arizona
National Parks Conservation Association
National Tribal Environmental Council
National Trust for Historic Preservation
National Trust for Historical Conservation
National Wildlife Federation
Natural Resources Defense Council
The Nature Conservancy
The Nature Conservancy of New Mexico
The Nature Conservancy, New Mexico Field Office
New Mexico Cattle Grower's Association
New Mexico Conservation Voters
New Mexico Environmental Law Center
New Mexico Farm and Livestock Bureau
New Mexico Farm and Livestock Bureau, Collegiate Farm Bureau
New Mexico Federal Lands Council
New Mexico Interstate Stream Commission
New Mexico Land Conservancy
New Mexico Natural History Institute
New Mexico Off Highway Vehicle Alliance
New Mexico Off Highway Vehicle Association
New Mexico Solar Energy Association
New Mexico Wilderness Alliance
New Mexico Wildlife Federation
New Mexico Wind Working Group
New Mexico Wool Growers
Pima County Farm Bureau
Pinal County Farm Bureau
Public Lands Foundation

**Table 5-13. Organizations and Special Interest Groups Notified
(Continued)**

Public Lands Interpretive Association
Redington Natural Resource Conservation District
Rocky Mountain Bird Observatory
San Pedro Natural Resource Conservation District
Shooting Roundtable
Sierra Club
Sierra Club, El Paso Group
Sierra Club Rincon Chapter
Sierra Club Rio Grande Chapter
Sky Island Alliance
Solar Reserve
Sonoran Institute
Southern Arizona Buffelgrass Coordination Center
Southern Arizona Leadership Council
Southwest Environmental Center
Southwest Natural Resources
Southwest New Mexico Grazing Association
Southwest Regional Conservation Committee
Southwestern Power Administration
Tonopah Area Coalition
Trust for Public Land
Tucson Audubon
Tucson Mountains Association
Union of Concerned Scientists
Upper Gila Watershed Alliance
Upper San Pedro Partnership
Western Environmental Law Center
Western Governors' Association
Western Interstate Energy Board
Western Regional Partnership
Western Resource Advocates
Western Watersheds Project
WildEarth Guardians
Wilderness Land Trust
The Wilderness Society
The Wilderness Society / BLM Action Center
Wings Over Willcox

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